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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Todd C. Engel,
Plaintiff,
v.
United States of America, *et al.*,
Defendants

WQH-EJY
No. 2:22-cv-01040-JCM-NJK

**UNOPPOSED MOTION TO EXTEND
TIME TO FILE RESPONSIVE
PLEADING
(FIRST REQUESTED EXTENSION)**

Defendant United States of America hereby moves pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule LR IA 6-1, for a 60-day extension of time to November 4, 2022, to file a responsive pleading to Plaintiff's Complaint (Doc. 1).

This is Defendants' first requested extension of time in this matter.

Counsel for United States has an unusually heavy workload with a high number of filings due to be completed in the next three weeks, and has a trial scheduled to begin on September 12, 2022, followed by a long-scheduled vacation starting on September 26, 2022. Furthermore, the responsive pleading in this matter requires review and comment by counsel for multiple federal agencies before filing. The case styled *Joseph O'Shaughnessy v. United States of America*, 2:22-cv-01040-APG-DJA concerns many of the same events and the same attorneys as the above captioned case and was filed the same day. An

1 identical unopposed motion to extend has been filed in the *O'Shaughnessy* case.

2 Undersigned counsel Heathcotte affirms that Plaintiff's counsel Marquiz consents
3 to the granting of this motion.

4 For the foregoing reasons, Defendant respectfully requests that the deadline to file
5 a responsive pleading to the Complaint be extended to November 4, 2022.

6 RESPECTFULLY SUBMITTED this August 22, 2022.
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8 MERRICK GARLAND
9 United States Attorney General

10 *s/ Brock Heathcotte*
11 BROCK HEATHCOTTE
12 Special Assistant United States Attorney, Acting
Under Authority Conferred by 28 U.S.C. § 515
Attorneys for Defendant United States

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14 IT IS SO ORDERED:
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17 UNITED STATES MAGISTRATE JUDGE
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19 DATED: August 22, 2022
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